

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BROOKE K. WHITMAN, Individually and)
as Mother and Next Friend of SAMANTHA)
KATE WHITMAN, a minor, and JOEL)
WHITMAN, Individually)

Plaintiffs)

vs.)

AUTOMATIC DATA PROCESSING, INC.,)
CHANNEL ONE COMMUNICATIONS)
CORPORATION, d/b/a CHANNEL ONE)
NETWORK, and PRIMEDIA, INC.)

Defendants)

Civil Action No.
03-CV-12543RGS

FILED
CLERK'S OFFICE
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DISTRICT OF MASS.

**JOINT MOTION OF PARTIES TO CONTINUE DEADLINE FOR PLAINTIFFS TO
FILE STATEMENT IN ACCORDANCE WITH THE COURT'S ORDER DATED
MARCH 22, 2004, AND FOR DEFENDANTS TO ANSWER THE SECOND
AMENDED COMPLAINT, AND MAKE THEIR AUTOMATIC DISCLOSURES**

Now come the parties and jointly move that the sixty (60) deadline for the plaintiffs to file a Statement in accordance with the Order of the Court on March 22, 2004 at the Rule 16.1 Scheduling Conference (the "Conference"), which Order was in response to the Motion to Reconsider the Motion to Dismiss that was made orally at the Conference by the defendant, Channel One Communications Corporation, d/b/a Channel One Network ("Channel One"), be extended for a period of thirty (30) days, to and including June 21, 2004.

The parties further agree that the defendants' Answers to the Second Amended Complaint will be due twenty (20) days after receipt of plaintiffs' Statement, and that their Automatic Disclosures will be due on or before May 14, 2004, and they move the Court to


extend the times for the defendants to file their Answers and make their Automatic Disclosures as the parties have stipulated.

As grounds, plaintiffs say the following: (1) that they have scheduled discovery (depositions of the defendants), which they say are needed to enable them to file a proper Statement, but that the schedules of the attorneys are such that they need the additional time to take them; and (2) that on or about April 20, 2004, Michael Kendall, Esq., withdrew as counsel for Channel One, and Ann Donovan, Esq., filed her appearance as successor counsel, and she needs additional time to familiarize herself with the file before proceeding to the depositions.

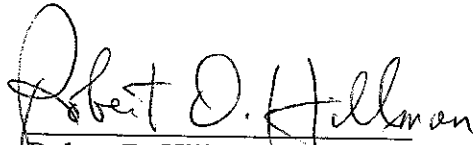
WHEREFORE, the parties move that the deadline for the plaintiffs to file the Statement in accordance with the Order of the Court on March 22, 2004, be extended for a period of thirty (30) days, to and including June 21, 2004, that the deadline for the defendants' Answers to the Second Amended Complaint be filed within twenty (20) days after receipt of plaintiffs' Statement, and that the deadline for the defendants' Automatic Disclosures be May 14, 2004.

Plaintiffs,
By Their Attorneys,

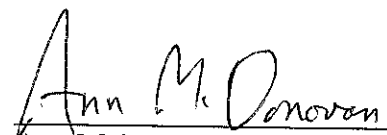
Dated: 4/28/04


Norman J. Fine, Esq. (BBO #165280)
Robert Anderson, Esq. (BBO #018520)
NORMAN J. FINE, P.C.
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Defendant, Automated Data Processing, Inc.
By Its Attorney,


Robert D. Hillman, Esq. (BBO #552637) ^{NF} per auth.
DEUTSCH WILLIAMS BROOKS,
DeRENSIS & HOLLAND, P.C.
99 Summer Street
Boston, MA 02110-1213
(617) 951-2300

Defendant, Channel One Communications
Corporation,
By Its Attorney,


Ann M. Donovan, Esq. (BBO #552819) ^{NF} per auth.
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DISTRICT COURT
DISTRICT OF MASS.

April 28, 2004

Mr. Tony Anastas, Clerk
United States District Court
for the District of Massachusetts
One Courthouse Way
Boston, MA 02210

RE: Brooke K. Whitman, et al. v. Automatic Data Processing, Inc., et al.
Civil Action No: 03-CV-12543RGS

Dear Mr. Anastas:

Enclosed for filing please find the following:

Joint Motion of Parties to Continue Deadline for Plaintiffs to
File Statement in Accordance with the Court's Order Dated
March 22, 2004, and for Defendants to Answer the Second
Amended Complaint, and Make Their Automatic Disclosures

Kindly file this document with the papers, record this information on the docket,
and present same to the Court for its consideration, as soon as practicable.

Thank you.

Very truly yours,


Norman J. Fine

Encl.
Cc: Ann M. Donovan, Esq.
Robert D. Hillman, Esq.
Robert C. Anderson, Esq. (By FAX)